



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601*

June 15, 2022

**BY ECF**

The Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States v. Joseph Maharaj, et al.*, 22 Cr. 18 (NSR)**

Dear Judge Román:

The above-referenced matter is currently scheduled for a status conference on June 21, 2022, at 11 a.m. The Government, and the respective defense counsel for defendants Joseph Maharaj and Shawn Rains, jointly and respectfully request that the conference be adjourned until July 21, 2022, at 12 p.m. This is the first such request for an adjournment.

Should the above application be granted, the Government respectfully requests, with the consent of both defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today through the date of the next conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial. The requested adjournment would allow the Government to continue producing discovery; would allow defense counsel to continue reviewing that discovery and to evaluate any potential motion practice; and would also allow the Government and defense counsel to engage in discussions regarding a potential resolution of the matter without the need for trial. The Government respectfully encloses a proposed order excluding time for the Court's consideration.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Kerry Lawrence, Esq.  
Stephen Riebling, Esq.